

Safety Evaluation Number¹: SE-W375-00-00011 Revision No: 0

ABCN-W375-00-00006 and ABCN-
ABCN Number: W375-00-00010

Safety Evaluation Subject: Alignment of ISMP and SRD with QAPIP Rev. 5

PART I: DESCRIPTION OF THE PROPOSED REVISION, BACKGROUND, AND SCHEDULE

1. Describe the proposed revision (including credible failure modes, if applicable).

Revise appropriate sections of the current Integrated Safety Management Plan (ISMP) and Safety Requirements Document (SRD) to make them consistent with Revision 5 of the QAPIP. Revise revision-specific QAPIP references in the SRD and ISMP from Rev. 4 to Rev. 5, or delete the revision-specific reference.

In letter #00-RU-0163, the Regulatory Unit approved Revision 4C of the QAPIP, subject to two conditions, one of which was: “BNFL shall modify the TWRS-P Project Integrated Safety Management Plan (BNFL-5193-ISP-01, Revision 4) as necessary to reflect the changes to the QAPIP.” (The RU also noted that, with its approval, BNFL will issue Revision 4C of the QAPIP, as modified to respond to RU comments, as Revision 5.)

Because much of the current ISMP discussion of Quality Assurance duplicates that contained in the QAPIP, this revision also removes such redundant material from the ISMP, replacing it, as necessary, with cross-references to the QAPIP. Similarly, where the ISMP cites portions of the ISAR for details of specific QA requirements, such citations have been deleted.

In addition, several changes to the Acronyms section of the ISMP are included in this revision. One such change merely corrects a typographical error for the acronym “QAPIP;” in so doing, the acronym is relocated in the alphabetized list. The other changes delete acronyms that are not used anywhere within the body of the ISMP and so are superfluous.

2. Identify the affected Authorization Basis (AB) documents and perform a comparison and assessment of the revision against the AB.

The affected AB documents are the SRD, ISMP, ISAR and QAPIP, as listed in the References below. No actual changes are being made to the QAPIP or ISAR by this revision; however, citations to these documents in the SRD and ISMP are either updated or deleted.

ABCN-W375-00-00010, Rev. 0, p. 2 states:

“The following sections of the SRD Rev. 2e will be reviewed against QAPIP for consistency:

Volume I, 2.3, Independent Safety Review Team Credentials

Volume II, 7.3, Quality Assurance Program

Appendix A, 6.0 Classification of Structures, Systems, and Components

Appendix B, 2.6.2, Discussion.”

SRD Vol. I, §2.3 is unaffected by this revision.

The necessary changes to SRD Vol. II, §7.3 are the subject of Safety Evaluation SE-W375-00-00012; therefore, this section of the SRD is not addressed by this Safety Evaluation.

The classification of structures, systems, and components in SRD Vol. II, Appendix A, §6.0 is unaffected by this

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revision.

The reference to the Quality Assurance Program in SRD Vol. II Appendix B is revised from QAPIP Rev. 4 to the QAPIP, without the revision number.

The remainder of the AB changes are to the ISMP, in accordance with ABCN-W375-00-00006.

3. List the references used for the safety evaluation.

BNFL-5193-ISP-01, Rev. 4b, November 9, 1999, *Integrated Safety Management Plan*, BNFL Inc., Richland, Washington

BNFL-5193-SRD-01, Rev. 2e, January 18, 2000, *Safety Requirements Document*, BNFL Inc., Richland, Washington

BNFL-5193-ISAR-01, Rev. 0, January 12, 1998, *Initial Safety Analysis Report*, BNFL Inc., Richland, Washington

BNFL-5193-QAP-01, Rev. 5, *Quality Assurance Program and Implementation Plan*, BNFL Inc., Richland, Washington (to be issued upon approval of ABAR-W375-00-00010)

Gibbs, D. C., "Approval of BNFL-5193-QAP-01, Rev. 4C, 'Quality Assurance Program and Implementation Plan' (QAPIP)," 00-RU-0063, (letter to Mr. M. J. Bullock, BNFL, Inc., January 7, 2000), U.S. Department of Energy, Richland Operations Office, Richland, Washington

Gibbs, D. C., "Authorization Basis Management Inspection Report, IR-99-007," 00-RU-0014, (letter to Mr. M. J. Lawrence, BNFL, Inc., December 13, 1999), U.S. Department of Energy, Richland Operations Office, Richland, Washington

4. Describe the planned revision implementation schedule.

The changes will be incorporated into the ISMP within 30 days of RU approval.

PART II: REGULATORY IMPACT OF PROPOSED AB REVISION

The following questions are to be answered as part of the safety evaluation, to determine if the proposed AB revision (and the proposed initiating change if applicable) requires prior RU approval.

- | | <u>YES</u> | <u>NO</u> |
|---|-------------------------------------|--------------------------|
| 1. Does the revision involve the deletion or modification of a standard previously identified or established in the approved SRD? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

JUSTIFICATION:

This revision involves the modification of several ISMP sections that are identified as implementing standards in the following SRD Safety Criteria:

SRD Safety Criterion	ISMP Reference
1.0-1	Ch. 5.0
1.0-9	Ch. 1.0

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		<u>YES</u>	<u>NO</u>
3.1-8	Ch. 8.0		
4.2-3	§ 1.3.10		
4.5-15	§ 1.3.9		
4.5-16	Ch. 10.0		
4.5-17	Ch. 8.0		
4.5-18	Ch. 10.0		
7.0-1	§ 1.3.13		
7.1-2	§ 5.2		
7.1-3	§ 1.3.13		
7.1-3	Ch. 10.0		
7.2-4	Ch. 8.0		
7.2-8	§ 5.2		
7.6-3	§ 1.3.10		
7.6-3	Ch. 10.0		
7.6-4	§ 1.3.11		
7.7-2	Ch. 8.0		
7.7-9	§ 5.2		
7.8-1	Ch. 8.0		
9.1-5	Ch. 8.0		
9.2-6	Ch. 8.0		
9.3-1	Ch. 5.0		
9.3-2	Ch. 5.0		
9.3-3	Ch. 5.0		
9.3-4	Ch. 5.0		
9.3-5	Ch. 5.0		

In addition, SRD Vol. II, Appendix B, Implementing Standard for Defense in Depth, is being revised to replace the specific reference to QAPIP Rev. 4 with a general reference to the QAPIP. (This is actually an editorial change that is being made to avoid the need to revise revision-specific references in one AB document to another.)

2. Does the revision result in a reduction in commitment currently described in the AB? ☐ ☒

JUSTIFICATION:

This revision primarily removes descriptive material from the ISMP that is redundant to that provided in the QAP. Since the QAP is an AB document of equal regulatory stature to the ISMP, and since Rev. 5 of the QAP has been approved by the RU, there can be no reduction in commitment.

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YESNO

Statements in the ISMP that describe the content of the QAP are redundant to the QAP and can be removed with no reduction in commitment. Also being deleted are statements in the ISMP that indicate that "details" on the application of the QAP to training, qualification, procedure development, and records management are provided in the ISAR. However, the cited ISAR sections do not provide any detail beyond that in the QAP and ISMP.

Also, a sentence in ISMP subsection 3.3.1.5 concerning the objectives of the QAP is being expanded to provide equivalent language to that in Rev. 5 of the QAP. This revision does not constitute a reduction in commitment.

3. Does the revision result in a reduction in the effectiveness of any program, procedure, or plan described in the AB.

☐☒

JUSTIFICATION:

The substantive changes in this revision all relate to removal of material from the ISMP that is redundant to that in the approved QAP. The quality assurance program itself is not being changed; therefore, there is no reduction in effectiveness of any program, procedure or plan described in the AB.

Note: Guidance on defining the terms and responding to the above questions is provided in K70C528, Code of Practice for Managing Changes to the Authorization Basis, Appendix 6.

If all the answers to the above questions are no, then the change can be made without prior RU approval.

If any of the above answers is yes, then RU approval is required prior to implementation of the AB revision (and the initiating change if applicable). An ABAR shall be prepared to obtain RU approval (see K70C528, Appendix 7.)

PART III: SAFETY EVALUATION CONCLUSION

☐ All PART II questions are answered No. Therefore, RU approval is NOT required prior to implementing the proposed AB revision (and initiating change where applicable).

☒ At least one PART II question is answered Yes. Therefore, RU approval IS required prior to implementing the proposed AB revision (and initiating change where applicable). Issuance of an ABAR is required to obtain RU approval.

Evaluator/Originator_____
Date

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Reviewer²

Date

Radiation Safety and Regulatory Manager

Date

Chair, Project Safety Committee³

Date

RPP-WTP General Manager³

Date

² The reviewer should be a person from the same department as the Evaluator/Originator and at least as qualified as the Evaluator/Originator to conduct safety evaluations.

³ This signature required if Safety Evaluation concludes AB change can be made without RU prior approval. If RU approval (ABAR) is required, PSC and GM signatures occur on the ABAR.